



SANITARY DISTRICT OF HIGHLAND

Incorporated in
1910

Highland Municipal Building

3333 Ridge Road

Highland, Indiana 46322

(219) 972-5069

Fax: (219) 972-5097

March 17, 2010

Water Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard (WC-15J)
Chicago, Illinois 60604

Attention: Barbara VanTil, Environmental Scientist

Re: Wet Weather/Sanitary Sewer System Information Request

Dear Ms. VanTil:

Pursuant to your request, we are forwarding herewith our answers to your interrogatories concerning the Highland Sanitary District. Also attached hereto are supporting documents.

The questionnaire was filled out, if space was available. Otherwise, the answers are provided in the attached appendix to the questionnaire.

I certify under penalty of law that this response and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including of fine and imprisonment for knowing violations.

Sincerely,

John M. Bach
Public Works Director

RECEIVED

MAR 19 2010

Water Enforcement &
Compliance Assurance Branch
U.S. EPA Region 5

Sanitary District
Board of
Commissioners

David Jones

Rex Burton

Thurman Ferree

Robert Johnsen

Mark Knesek

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Attorney

Advisory Staff

Michael W. Griffin
Fiscal Officer

John M. Bach
Public Works Director
jbach@highland.in.gov

Class A
Wastewater &
Stormwater Utility



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 17 2000

REPLY TO THE ATTENTION OF: WC-15J

CERTIFIED MAIL 7001 0320 0005 9024 9864
RETURN RECEIPT REQUESTED

John Bach, Public Works Director
Highland Sanitary District
3333 Ridge Road
Highland, Indiana 46322

Subject: Wet Weather/Sanitary Sewer System Information Request
Pursuant to Section 308 of the Clean Water Act 33 U.S.C. §1318
Docket No. V-W-10-308- 14

Dear Mr. Bach:

Protecting water quality is a high priority of the U.S. Environmental Protection Agency. Pollutants such as bacteria discharged to waterways from sewer overflows contribute to poor water quality and impairment of uses of those waterways.

As authorized by the Clean Water Act (CWA or the "Act"), the National Pollutant Discharge Elimination System permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. As you know, the Highland Sanitary District is a satellite system which contributes sanitary sewer flow to the Hammond Sanitary District wastewater treatment plant. This request seeks information related to the operation and maintenance of the collection system and overflows from the system.

EPA is authorized under Section 308 of the CWA, 33 U.S.C. § 1318, to require reports and other information necessary to carry out the purpose of the Act. Accordingly, pursuant to Section 308 of the Act, you are directed to provide EPA with the information requested in the enclosure.

Please submit the information requested in the accompanying documents with a statement certifying that all representations contained therein are true and accurate to the best of your knowledge and belief using the certification language provided. Please exercise care to assure that responses are complete and accurate, because Section 309(c)(2) of the Act, 33 U.S.C. § 1319(c)(2), provides for the imposition of criminal penalties where false information is knowingly provided to EPA.

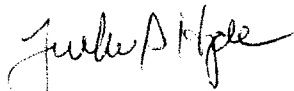
18

Please respond in writing with the information requested in the enclosure, within thirty (30) days of receipt of this letter with copies to:

Water Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd. (WC-15J)
Chicago, Illinois 60604
Attention: Barbara VanTil, Environmental Scientist

Thank you for your cooperation in this matter. Should you have any questions, please call Barbara VanTil of my staff at (312) 886-3164, or Jennifer Jungmann of my staff at (312) 353-4627.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tinka G. Hyde".

Tinka G. Hyde
Director, Water Division

Enclosure

cc: Debbie Dubenetzky w/enclosure, IDEM

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:)	Docket No. V-W-10-308- 14/
)	
Highland Sanitary District)	
3333 Ridge Road)	
Highland, Indiana 46322)	Proceeding under
)	Section 308(a) of the
)	Clean Water Act, as amended,
)	33 U.S.C. § 1318(a)

The following request is made pursuant to the authority vested in the Administrator of the U.S. Environmental Protection Agency by the above referenced statute (CWA) and duly re-delegated to the undersigned Director of the Water Division, Region 5. There can be significant civil or criminal penalties for failing to adequately respond to requests for information issued under CWA Section 308(a), 33 U.S.C. § 1318(a).

DEFINITIONS

1. "Bypass" as that term is defined in 40 CFR § 122.41(m) means the intentional diversion of waste streams from any portion of a treatment facility.
2. "Day" or "days" shall mean calendar day or calendar days. In computing any period of time under this 308 request, where the last day would fall on a Saturday, Sunday, federal or state holiday, the period shall run until the close of the next business day.
3. "Discharge of a Pollutant" shall be defined as that term is defined in Section 502(12), 33 U.S.C. § 1361(12) of the CWA.
4. "Point Source" shall be defined as that term is defined in Section 502(14), 33 U.S.C. § 1361(14) of the CWA.
5. "Pollutant" shall be defined as that term is defined in Section 502(6), 33 U.S.C. § 1362(6).
6. "Record" or "records" is defined for purposes of this request as any recording of information in tangible form. It includes, but is not limited to, documents, memoranda, reports, letters, maps, graphs, charts, log books, notes, computer printouts, and computer databases.

7. "Sanitary Sewer Overflow(s)" or "SSO(s)" refers to a Discharge of a Pollutant from any Point Source located in the Sanitary Sewer System tributary to Hammond Sanitary District's wastewater treatment plant.
8. "Sanitary Sewer System(s)" shall mean all portions of Highland Sanitary District's sewer system (including all pipes, force mains, gravity sewer segments, overflow structures, regulators, pump stations, manholes, and components thereof), designed and constructed to collect and convey sanitary sewage to the Hammond Sanitary District wastewater treatment plant.
9. "Wastewater Treatment Plant(s)" or "WWTP(s)" shall mean the sewage treatment plant(s) operated by the Hammond Sanitary District and located at 5143 Columbia Avenue, Hammond, IN, 46327, and all components of such sewage treatment plant(s).
10. "You" for purposes of this request refers to Highland Sanitary District and to any agents, employees, contractors, or other entities that performed work or acted in any way on behalf of, or at the direction of Highland Sanitary District.

INSTRUCTIONS

- A. You must respond to this request for information within 30 calendar days from receipt of this request.
- B. You must respond separately to each of the questions or requests. Where a "yes" or "no" answer is requested, you can provide additional information, if desired. If the requested information requires a lengthy narrative response, precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.
- C. If the Highland Sanitary District does not have documents responsive to a particular question, in its written response to this request, state that the Highland Sanitary District does not have such documents.
- D. The Highland Sanitary District shall maintain the reports and all records reviewed or generated in the course of responding to this Information Request, until EPA informs the Highland Sanitary District in writing that maintenance of such records is no longer required.

REQUEST FOR INFORMATION

1. Provide the name and address of the location(s) where records relative to the operation and maintenance of the wastewater collection system are maintained. *see appendix*

2. Provide the name of the primary contact person responsible for wastewater collection and system maintenance. Also include telephone, Fax and Email contact information. *see appendix*

3. Provide collection system data as indicated below:

- A. Service Area 7.0 (in square miles)
 B. Population Served 23546 (2000 census)
 C. System Inventory

Miles of gravity sewer	Miles of force main	Number of maintenance access structures	Number of pump stations	Number of siphons	Number of air, vacuum, or air/vacuum relief valves
87.09	4.46	2098	10	0	4*

**approx*

- D. Number of Service Connections:
 Residential 8346 Commercial 868
 Industrial 1 Total 9215

- E. Indicate or describe a property owner's responsibility for maintenance and repair of lateral sewer lines. (check one):
 1. At main line connection only _____
 2. From main line to property line or easement/cleanout _____
 3. Beyond property line/cleanout _____
 4. Other ☒ Explain. *House to mainline sanitary sewer*

- F. Is the collection system combined (storm and sanitary)? Yes ☐ No ☒
 If yes, what percent of the collection system is a combined system? _____

- G. Does the collection system have constructed relief points? Yes ☒ No ☐
 If yes, describe the locations of the relief points in the system, indicate if they are in the separate sanitary portion of the system or in a combined area and identify the water body or location where these relief points discharge. *see appendix*

- H. Average Annual Precipitation 41.86 (in inches) *see appendix*

I. Provide current actual sanitary sewer flows or ratings experienced within the Highland Sanitary District which are tributary to the Hammond Sanitary District wastewater treatment plant:

	Average Daily Flow (MGD)	Average Daily Water Consumption (MGD)
Residential		
Commercial		
Industrial		
Other		
Total	3.85 (2009)	2.36 (2009)

	Per Capita Wastewater Flow (MGD) (per Cap)	Per Capita Water Consumption Flow (MGD) (per Cap)
Maximum Month March 2009	5.56 236 GPD	2.66 112 GPD
Maximum Week 9/13/08 - 9/19/08	10.57 448 GPD	5.37 228 GPD
Maximum Day 9/14/08	15.60 662 GPD	5.55 235 GPD

J. Provide infrastructure age distribution estimates for the collection system

Age	Gravity Sewer, miles	Force Mains, miles or feet	Number of Pump Stations
0 - 25 years	12.07	0.15	2
26 - 50 years	46.25	1.93	4
51 - 75 years	28.77	2.58	4
> 76 years			

K. Provide collection system pipe size distribution estimates for the collection system

Diameter in inches	Gravity Sewer, miles	Force Mains, miles or feet
8 inches or less	38.52	.77
9 - 18 inches	42.81	2.99
19 - 36 inches	5.73	0.70
> 36 inches	0.03	—

4. Does the collection system receive flow from satellite communities?
 Yes _____ No X If yes, complete the following chart.

Satellite Name (If additional room is needed, continue on last page.)	% of flow contribution

5. As a satellite community to the Hammond Sanitary District, do you enter into written agreements for wastewater services (contracts, charters, court orders, etc.) with Hammond?

Yes X No _____

Please describe: If "Yes", please answer A-F below:

- A. Does the agreement extend the requirements of the sewer use ordinance (SUO) to the Highland Sanitary District?
 Yes X No _____ *see appendix*
- B. Do the agreements have a date of termination and allow for renewal under different terms?
 Yes X No _____
- C. Does the Hammond Sanitary District maintain the legal authority to control the maximum flow introduced into the collection system from the Highland Sanitary District?
 Yes X No _____ *see appendix*
- D. Is flow measured where the Highland Sanitary District's flow enters the Hammond Sanitary District's sewer system?
 Yes _____ No X *see appendix*
- E. Does the Hammond Sanitary District have the authority to surcharge the Highland Sanitary District for excessive flows (e.g., for excessive I/I)?
 Yes _____ No X *see appendix*
- F. Has the Hammond Sanitary District exercised their authority to surcharge Highland Sanitary District for excessive flows (e.g., for excessive I/I)?
 Yes _____ No X *see appendix*

6. Does the sewer use ordinance (SUO) clearly include standards, inspections, and approval for new connections?

Yes X No _____

7. Does the SUO require satellite communities to adopt the same inspection and sampling schedules as required by the pretreatment ordinance?

Yes X No _____ NA _____

8. Does the SUO contain procedures for the following: inspection standards, pretreatment requirements, building/sewer permit issues, inflow prohibition?

Yes X No

9. Indicate whether the SUO contain procedures and enforcement authority to control for the following:

- | | | | | | |
|----|---|-----|---------------|----|---------------|
| A. | Fats, oils, and grease (FOG) | Yes | <u>X</u> | No | <u> </u> |
| B. | Inflow and infiltration | Yes | <u>X</u> | No | <u> </u> |
| C. | Building structures over the sewer lines | Yes | <u> </u> | No | <u>X</u> |
| D. | Storm water connections to sanitary lines | Yes | <u>X</u> | No | <u> </u> |
| E. | Defects in service laterals located on private property | Yes | <u> </u> | No | <u>X</u> |
| F. | Sump pumps, air conditioner discharge | Yes | <u>X</u> | No | <u> </u> |

10. Describe the process or procedures that are used in determining whether the capacity of existing gravity sewer system, pump stations, and force mains are adequate for new connections?

- A. Is metering of flow performed prior to allowing new connections? *see appendix*
- B. Is a hydraulic model of the system used to predict the effects of new connections? *see appendix*
- C. Is there any certification as to the adequacy of the sewer system to carry additional flow from new connections required? *see appendix*

11. Describe any atypical local conditions that may increase the complexity or difficulty during design, construction, operation, and maintenance of the collection system. Provide a brief explanation of the local conditions and measures utilized to compensate for the condition such as;

- A. Weather (ex. precipitation, temperature);
 - B. Terrain/Geology/Soils;
 - C. Groundwater or surface water body influence.
- see appendix*

12. Has the system experienced corrosion problems in the last 5 years? Describe the extent that corrosion in the collection system is a maintenance problem. Is there a corrosion control program in place? If so, what has been the preferred treatment or prevention program selected or implemented? *see appendix*

13. Is there an odor control program in place? Describe the extent of any odor control issues and identify the locations where odor complaints originate. *no*

14. Is there a grease control program in place? Describe the program and the extent that grease blockages in the collection system are a problem and identify the locations where chronic grease blockages occur. What tools are used to address grease problems such as: grease trap ordinances and inspections; physical removal of grease; chemical additions to dislodge or dissolve grease? *see appendix*

15. Is there a root control program in place? Describe the program and the extent that root blockages in the collection system are problem and identify the locations where chronic root blockages occur. *see appendix*

16. Provide a description of Sanitary Sewer Overflows (SSOs), discharges, releases or bypasses (e.g., whenever the sewage left its piping system) that have occurred in the collection system within the last five years. Include the following information for each incident: *see appendix*

- Date
- Location
- Estimated volume of the SSO, discharges release or bypass
- Cause of the SSO, discharge, release or bypass
- Disposition of the SSO, discharge, release or bypass (did the release reach a waterway, flow to storm sewer, paved areas, basements etc)
- Actions taken to mitigate the SSO, discharges release or bypass.

17. Of the SSOs, discharges, releases or bypasses to waterways that are identified in response to the proceeding question above, how many were to surface waters that could affect: *see appendix*

- A. Primary contact recreation (swimming, bathing, waterskiing etc.) _____
- B. Shellfish growing areas _____
- C. Drinking water sources _____

18. Approximately, how many of SSOs, discharges, release or bypasses were from:

- A. Manholes 0
 - B. Pump stations _____
 - C. Main and trunk sewers 0
 - D. Lateral and branch sewers _____
 - E. Structural bypasses 20
- in the past five (5)*
combination pumps and cross connections

19. Approximately, how many of the SSOs, discharges, release or bypasses were caused by the following:

- A. Debris buildup _____
- B. Collapsed pipe _____
- C. Root intrusion _____
- D. Capacity limitations _____
- E. Excessive infiltration & inflow 20
- F. Fat/Oil/Grease _____
- G. Vandalism _____
- H. Power Interruption and/or Lack of Backup Power Source 1
- I. Mechanical or Electronic Failure 2
- J. Pump failure and/or Lack of Backup (or Duplex) Pumps? _____

20. What equipment is available for responding to SSOs, discharges, releases or bypasses? *see appendix*

21. Has Highland Sanitary District developed and adopted written procedures or instructions for the following:

- | | | | | | |
|----|---|-----|----------|----|----------|
| A. | SSO, bypass and containment? | Yes | _____ | No | <u>X</u> |
| B. | Reporting all SSOs to the state regardless of size? | Yes | _____ | No | <u>X</u> |
| C. | Containment or cleanup to mitigate effect of SSOs? | Yes | _____ | No | <u>X</u> |
| D. | Problem evaluation and solution? | Yes | <u>X</u> | No | _____ |

see appendix

22. Are locations where multiple SSOs, discharges, release or bypasses have occurred posted with warning signs?

Yes _____ No X

23. Are there areas that experience basement or street flooding?

Yes X No _____ Describe: *see appendix*

24. Provide the following information related to SSOs, discharges, release or bypasses that occurred during dry weather:

- A. Number of stoppages, annually;
- B. Average time to clear a stoppage;
- C. Number of stoppages resulting in overflows and/or backups annually;
- D. Total quantity of overflows or releases.

25. Provide the following information related to pump and lift station design:

- | | | |
|----|---|---------------------|
| A. | Total number of stations in the collection system | <u>10</u> |
| B. | Number of pump stations with pump capacity redundancy | <u>10</u> |
| C. | Number of pump stations with backup power sources | <u>9</u> |
| D. | Number of pump stations with dry weather capacity limitations | <u>0</u> |
| E. | Number of pump stations with wet weather capacity limitations | <u>8</u> |
| F. | Number of pump or lift station failures resulting in overflows/releases or backup, in the last five years | <u>2</u> |
| G. | Total quantity of SSOs, discharges, release or bypasses expressed in Gallons or MG _____ | <i>see appendix</i> |
| H. | For each SSO, discharge, release or bypass, is failure mode and effect diagnosed? | |
| | Yes <u>X</u> No _____ | <i>see appendix</i> |
| I. | Are future preventive measures initiated based on diagnosis? | |
| | Yes <u>X</u> No _____ | <i>see appendix</i> |

26. Provide the number of miles or feet of force main monitored annually (visual surface inspection of alignment). *see appendix*

27. Provide the number of miles or feet of force main monitored annually (pressure profile, capacity). 0

28. Provide the number of force main failures in the last five years. 3

29. Provide a description of the cause(s) of each force main failure in the last five years.
corrosion / settlement

30. Provide the following information related to service to wastewater system users and customers: *see appendix*

- A. Average annual user charge rate for residential user \$299.52
- B. Is the residential rate based on water consumption or a flat rate? Describe.
- C. Number of user complaints annually for the last five years unknown
- D. Number of complaints that are agency responsibility unknown
- E. Number of wastewater public health or other warnings issued by Highland Sanitary District annually D
- F. Number of claims for damages due to backups annually for the last five years see appendix
- G. Provide the total cost of claims against Highland Sanitary District related to wastewater management settled annually for the last five years < \$5000 (estimate)
- H. When was the last wastewater related rate increase? January 1, 2010

31. Provide the following information related to financial management of wastewater service:

- A. Total annual revenue received from wastewater user charges
 - 1. Percent of revenue for long-term debt;
 - 2. Percent of revenue for treatment and disposal;
 - 3. Percent of revenue for collection and conveyance.
- B. Other sources of revenue (i.e., property tax, tap-in fees, etc.)
 - 1. Percent of revenue for long-term debt;
 - 2. Percent of revenue for treatment and disposal;
 - 3. Percent of revenue for collection and conveyance.
- C. Provide the annual operation and maintenance budget for the wastewater collection and conveyance system. *see attachment A*
- D. Provide the annual costs for operation and maintenance for the wastewater collection and conveyance system. *see attachment A*
- E. Does Highland Sanitary District have a long-range Wastewater Capacity Improvement Project (CIP) plan for system expansion, rehabilitation, and replacement Yes X No ? *see attachment B*
see appendix

32. Have infiltration/inflow (I/I) assessments been done to determine the extent of these components as part of the system's wastewater flow? Has it been proven that it is cost effective to eliminate I/I rather than continue to treat it. Has a sewer system evaluation study (SSES) been performed on system? If yes, when? Have rehabilitation projects been prioritized for correcting I/I problems? If so, how far has the I/I elimination program progressed? *see appendix*

33. Does the Highland Sanitary District operate an industrial pretreatment program?
Yes No X

34. Does the Highland Sanitary District have a private source inflow and infiltration reduction program? Yes X No Please describe. *see appendix*

35. Does Highland Sanitary District do internal T.V. inspection for evaluating the condition of the collection system? Yes X No _____ Smoke testing? Yes X No _____

36. Does the Sanitary Sewer System experience chronic O & M problems that are the result of design issues in the system? If yes, provide brief explanation. *see appendix*

37. Does the Sanitary Sewer System experience chronic O & M problems that are the result of construction issues in the system? If yes, provide brief explanation. *see appendix*

Please submit your responses to this request within the designated time frame to:

Water Enforcement & Compliance Branch (WC-15J)
U.S. EPA Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3590
Attention: Barbara VanTil, Environmental Scientist

You may consider confidential the information that you submit to us. You may assert a claim of business confidentiality for any portion of the submitted information. Information subject to a business confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B. Failure to assert a business confidentiality claim makes all submitted information available to the public without further notice.

In submitting the information required in this request, the Highland Sanitary District shall provide the following certification signed by an official or authorized agent:

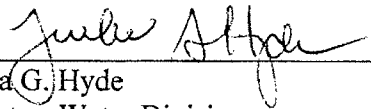
I certify under penalty of law that this response and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If at any time after submitting the requested information the signatory determines that any portion of such statement(s) certified as true is false or incorrect, the signatory must notify EPA. Knowingly providing false information, in response to this request, may be actionable under Section 309(c) (4) of the Act, 33 U.S.C. § 1319, and 18 U.S.C. §§ 1001 and 1341.

EPA may use the information submitted in response to this request in an administrative, civil, or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Please contact Barbara VanTil of my staff at (312) 886-3164 (or via email at vantil.barbara@epa.gov), or Jennifer Jungmann of my staff at (312) 353-4627 (or via email at jungmann.jennifer@epa.gov) if you have any questions about this request. Neither the issuance of this request by EPA nor compliance with this request by you, relieves you of liability for any penalty, fine, remedy, or sanction authorized to be imposed pursuant to Sections 309(b), (c), (d), and/or (g) of the Act, 33 U.S.C. § 1319(b), (c), (d), and/or (g), including but not limited to any violations addressed by this request. EPA specifically reserves the right to seek any or all of the remedies specified in Sections 309(b), (c), (d), and/or (g) of the Act, 33 U.S.C. § 1319(b), (c), (d), and/or (g).



Tinka G. Hyde
Director, Water Division
U.S. Environmental Protection Agency
Region 5

Date 2/11/10